

REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of April 20, 2006 (Office Action). As this response is timely filed within the three-month statutory period, no fee is believed due. Nonetheless, the Examiner is expressly authorized to charge any deficiencies or credit any overpayment to Deposit Account No. 50-0951.

Claims 1-9 were rejected in the Office Action under 35 U.S.C. 102 (b) as being anticipated by the newly-cited reference, U.S. Patent No. 6,229,880 to Reformato *et al.* (Reformato). In response, Applicants have amended independent Claims 1, 5, and 6 to further emphasize certain aspects of the invention. The claim amendments, as discussed herein, are fully supported throughout the Specification. (See, e.g., Specification, paragraphs [0008], [0009], [0022], [0023], [0029] – [0034], and [0037] – [0039].) No new matter has been introduced through the claim amendments.

Applicants' Invention

At this juncture, it may be useful to reiterate certain aspects of Applicants' invention. One embodiment of the invention, as typified by Claim 1, as amended, is a method of aggregating interactive voice response services from a plurality of interactive voice response (IVR) systems. The method can include storing within a master interactive voice response system caller-specific service information for accessing and interacting with a plurality of different IVR systems that each provide at least one service. The master interactive voice response system can respond to a single, caller-supplied input by forwarding a composite query to a particular one of the IVR systems.

More particularly, the composite query can correspond to a set of sequentially

related commands, the composite query and the corresponding sequence of commands having been predefined and stored by an individual caller. When received by the particular IVR system through the forwarding of the corresponding query, the sequentially related set of commands cause the IVR system to execute a particular IVR service. Specifically, the set of commands can instigate a sequence of queries and responses.

Because the particular responses are based upon the caller-specific service information, the service can correspond, or be performed, with respect to the particular caller. As described in the Specification, the caller can, for example, provide a single input, such as uttering the phrase "get my account balance," and the master IVR system can respond by forwarding the composite query to the appropriate one of the IVR systems, the result of which is to instigate through the corresponding sequence of commands the query-and-response interchange that will identify the caller to the IVR system, provide the necessary personal information, and retrieve for the caller the desired account balance.

The Claims Define Over The Prior Art

As already noted, each of the claims were rejected as being anticipated by Reformato. The purpose of Reformato is generally asserted to be the enhancement of "the utility and interoperability of peripheral devices" in communication systems. (Col. 3, lines 45-49.) The exclusive focus of Reformato's apparatus and methods is to allow a system subscriber to "obtain messages from the subscriber's voice mail services regardless of which IP [intelligent peripheral] the messages reside upon without requiring the subscriber to dial a telephone number corresponding to the voice mail IP." (Col. 3,

lines 55-59; see also Col. 4, lines 24 – 43; Col. 7, lines 43-47; Col. 12, line 64 – Col. 13, line 23; and Col. 16, lines 25 – 34; see also FIG's. 2, 4, and 6.) In particular, Reformato converts a subscriber's speech input into dual tone, multi-frequency (DTMF) signals, to which a voice mail IP responds without a caller "having to press keys of a telephone." (Col. 16, lines 25-53.)

In this respect, Reformato fails to teach, expressly or inherently, the aggregation of different interactive voice response services provided by different interactive voice response systems, as accomplished by Applicants' invention. Not surprisingly, therefore, Reformato fails to teach every feature recited in independent Claims 1, 5, and 6, as amended.

More fundamentally, Reformato fails to expressly or inherently teach, for example, storing caller-specific service information for accessing and interacting with a plurality of different interactive voice response systems. It thus follows that Reformato fails to teach storing such service information, wherein the service information is the basis for a sequence of queries and responses that are effected by a caller's supplying a single input. In particular, Reformato fails to teach a method or system that, in response to a single, caller-supplied command, forwards a composite query corresponding to a set of sequentially related commands that cause an interactive voice response system to execute at least one IVR system feature or service through a sequence of queries and responses based upon the caller-specific service information, as recited in amended independent Claims 1, 5, and 6.

In a portion of Reformato cited in the Office Action as disclosing the forwarding of a composite query, Reformato describes the response to a subscriber's speech input:

"Step 542 involves monitoring the line connected to the subscriber for speech such as the instruction "press one" or "one" which is to be recognized and converted into DTMF tones. Upon one of the speech recognition circuits 404 or 406 detecting a spoken digit, e.g., as part of a phrase such as "press one", a signal is sent to the DTMF tone generator circuit 410 instructing it to generate a DTMF tone corresponding to the detected digit. In step 544, one or more DTMF tones are generated in response to the speech recognized in step 542.

"The generated DTMF tones 546 are transmitted by the control IP 232 to the voice mail IP 228 or 230 to which the subscriber is connected. However, to avoid annoying the subscriber with the DTMF tones, in one embodiment, the line to the subscriber is muted while the tones are transmitted to the voice mail IP. Thus, the voice mail IP receives the DTMF signals generated from the subscribers speech and can respond thereto without the subscriber having to enter the signals by pressing keys and without the subscriber having to listen to the tones.

"After transmission of the generated tone operation proceeds to step 542 where the connection is monitored for additional speech. The process of monitoring the connection to a voice mail IP will continue for the duration of the connection to the voice mail IP. Accordingly, while connected to the voice mail IP 228 or 230, the subscriber will have the opportunity to input responses or commands to the voice mail IP using speech as opposed to having to press keys of a telephone." (Col. 16, lines 35-53.) (Emphasis Supplied.)

The explicit language of the cited portion emphatically reveals that Reformato does not contemplate a single input – speech or otherwise – that corresponds to a sequence of commands that cause an IVR system to execute a specific feature by instigating a series of queries and responses based on stored, caller-specific information.

Speech input in Reformato, firstly, does not correspond to a sequence of commands. Rather, it is merely a speech-based input that is converted into a DTMF signal. Secondly, the DTMF signal generated in Reformato does not instigate a series of queries and responses, let alone queries and responses that correspond to individualized, caller-specific information, as also recited in amended independent Claims 1, 5, and 6.

The explicit language of Reformato describes a caller's uttering a series of speech inputs that are sequentially converted to DTMF signals to effect accessing and control of a voice mail IP. Indeed, this sequential conversion and conveyance of DTMF "tones" is the reason for Reformato's "muting" the subscriber's line while DTMF tones are transmitted, so as "to avoid annoying the subscriber." (Col. 16, lines 35-4.) The conversion of a speech utterance into a corresponding DTMF signal, however, is not at all comparable to forwarding a composite query that corresponds to a sequence of commands for initiating an IVR system service or feature. Additionally, Reformato gives no indication that the resulting DTMF signal causes a series of queries and responses for executing a particular IVR system service. Moreover, there is no indication that Reformato's generic DTMF signal corresponds to individualized, caller-specific information.

It follows that while Reformato allows a caller to access a voice mail IP by uttering speech inputs, it does not enable a caller to enter a single input – speech or

otherwise – so that, based upon the single input, a particular one of different IVR systems is accessed and a particular feature or service is executed. With Applicants' invention, a single input can result in execution of the particular feature, precisely because the single input corresponds not to a single signal (e.g., DTMF tone), but rather a sequence of commands. The sequence of commands cause the series of queries and responses that are need for executing a particular IVR system service.

An example of this aspect of the invention, as described in the Specification, is when a caller utters the phrase "access my account balance." (See Specification, paragraphs [0037] and [0038].) Based on previously stored information, the utterance results in a composite query being forward to the correct one of different IVR systems, the composite query corresponding to a sequence of commands that execute the queries and responses, such as prompting for and receiving the customer account number, that renders the account balance to the customer. Reformato's speech-to-DTMF signal does not contemplate any of the features provided by Applicants' invention for accomplishing this result.

Accordingly, Reformato fails to explicitly or inherently teach every feature recited in amended independent Claims 1, 5, and 6. Applicants respectfully submit, therefore, that each of the independent claims defines over the prior art. Applicants further respectfully submit that whereas each of the dependent claims depends from one of Claims 1, 5, and 6 while reciting additional features, each of the dependent claims likewise defines over the prior art.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date: July 20, 2006



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